

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Civil Action No.: 05-30074-MAP

TAMMY WALKER,)
 Plaintiff)
))
v.)
))
CITY OF HOLYOKE,)
 Defendant)
_____)

**JOINT STATEMENT OF THE PARTIES IN
PREPARATION FOR SCHEDULING CONFERENCE**

The parties, by their respective counsel, file the following joint statement in accordance with the Notice of Scheduling Conference dated April 18, 2005, Fed. R. Civ. P. 26 and Local Rule 16.1 of the United States District Court of Massachusetts.

I. Joint Discovery Plan

- A. Initial disclosures to be made on or before July 13, 2005.
- B. Written discovery requests to be served by August 15, 2005.
- C. Non-expert depositions to be completed by February 10, 2006.
- D. Plaintiff to disclose expert witnesses by March 10, 2006.
- E. Defendant to disclose expert witnesses by April 10, 2006.
- F. Expert discovery, including, without limitation, depositions, if any, to be completed by June 2, 2006.

The parties will engage in settlement discussions prior to the commencement of fact depositions. If the parties are unable to resolve the case at this juncture, they will proceed with fact discovery and will reassess settlement before beginning expert discovery.

II. Proposed Schedule for Filing Motions

- A. All parties will be joined and pleadings will be amended by July 22, 2005.
- B. Dispositive motions to be filed by July 7, 2006.
- C. Oppositions to dispositive motions to be filed by July 28, 2006.

III. Certifications

The certifications of the parties are submitted under separate cover.

Respectfully submitted,

THE PLAINTIFF,
By Her Attorney

THE DEFENDANT,
By Its Attorney

By: Tani E. Sapirstein
Tani E. Sapirstein
BBO# 236850
Sapirstein & Sapirstein, P.C.
1341 Main Street – 3rd Floor
Springfield, MA 01103
Phone: (413) 827-7500
Fax: (413) 827-7797

By: Carole S. Lynch
Carole Sakowski Lynch
BBO# 547718
Morrison Mahoney LLP
1500 Main Street, Suite 2400
P.O. Box 15387
Springfield, MA 01115-5387
Phone: (413) 737-4373
Fax: (413) 739-3125

Dated:

K:\WP61\CASEFILE\Walker\Joint statement.wpd